

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING
GOOGLE LLC’S ADMINISTRATIVE
MOTION TO SEAL PORTIONS OF
GOOGLE LLC’S SUBMISSION IN
RESPONSE TO NOVEMBER 12 ORDER
ADOPTING IN PART AND MODIFYING
IN PART THE SPECIAL MASTER’S
REPORT AND ORDERS ON REFERRED
DISCOVERY ISSUES DKT. 331, 336**

Referral: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is Google LLC's Administrative Motion to Seal Portions Google's Submission in Response to November 12 Order Adopting in Part and Modifying in Part the Special Master's Report and Orders on Referred Discovery Issues Dkt. 331, 336 ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Documents Sought to Be Sealed	Court's Ruling on Motion to Seal	Party Claiming Confidentiality	Reason(s) for Court's Ruling
Exhibit A to Golueke Declaration in support of the Special Master Submission	Redacted in its entirety	Google	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including the various types of data sources which include information related to Google's data logs, internal data structures, internal identifiers and their proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Exhibit B to Golueke Declaration in support of the Special Master Submission	Portions Highlighted in Yellow at: Pages 3, 6, 7, 8, 10, 11, 13, 14, 17, 18, 19, 20	Google	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including the various types of data sources which include information related to Google's data logs, internal data structures,

			internal identifiers and their proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Exhibit B to Golueke Declaration in support of the Special Master Submission	Portions Highlighted in Blue at: Pages 1-20	Plaintiffs	Contains, summarizes, or reflects material ordinarily designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order.

SO ORDERED.

DATED: _____

HON. SUSAN VAN KEULEN
United States Magistrate Judge